

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In Re:	*	PROMESA
THE FINANCIAL OVERSIGHT AND		Title III
MANAGEMENT BOARD FOR PUERTO RICO	*	
		Case No 17-BK-3283-LTS
As representative of	*	
		Re: ECF DK. 6871, 6879,
THE COMMONWEALTH OF PUERTO RICO, et al.,	*	7084, 7312, 7534, 7845, 8207
		8383, 8496, 8587, 8709, 8842
Debtors ¹	*	8873, 8901, 8905, 8950, 8995

MOTION SUBMITTING EXHIBIT 2 WAIVER

To the Honorable United States Magistrate Judge Judith Gail Dein:

On October 11, 2019, The Commonwealth of Puerto Rico (the “Debtor”) filed a Motion Informing Compliance with Rule 2004 Request that had been filed by Cuerpo Organizado de la Policia, Inc. (“Movant” or “COPI”). (Docket Num. 8842). The movant respectfully understands that the debtor did not fully comply with the request for productions of documents made by COPI in their Motion filed on May 8, 2019. (Docket Num. 6871).

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. An Opposition to debtor's Motion Informing Compliance With Rule 2004 was filed on November 1, 2019. (docket 9092)
2. Inadvertently the exhibit 2 the Waiver was not attached to the above referenced motion.
3. Based on the above the present motion is being filed in order to submit with the Honorable Court Exhibit 2 the Waiver.

WHEREFORE; pray the Honorable Court to be informed.

CERTIFICATION: I hereby certify that on 12/10/2019 I electronically filed the foregoing with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Trustee assigned to the case, and I hereby certify that I have mailed by the United States Postal Service the document to the following non CM/ECF participants: all CREDITORS IN THE MASTER MAILING LISTING.

Dated: December 10, 2019
Mayaguez, Puerto Rico

/s/ Lirio Del Mar Torres
LIRIO TORRES LAW OFFICE
Lirio Del Mar Torres, Esq., USDC-PR 225814
PO Box 3552
Mayaguez, PR 00681-3552
Telephone: (787) 265-5050
liriotorresjust@gmail.com
*Counsel to Cuerpo Organizado de la Policia,
Inc. (COPI)*

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Employee Decision and Release
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NOTICE

The employees who decide to agree to the payment of the informed amount of the debt for salary adjustment will receive a check for said amount paying off and settling the debt owed to them from previous years. This decision will be final and irrevocable and constitutes a full and absolute release, and a waiver of rights with regards to any actual or potential claim based on the employment relationship and/or the termination of same under any applicable law. This waiver of rights shall have the effect of a full settlement of any actual or potential action or right, known or unknown, that the employee has, may have, or may have had, related to his/her employment and the termination of same. The effect of this release and the corresponding waiver of rights shall be that of res judicata.

The employee guarantees and affirms that he/she has not filed, as of this time, any claim, complaint, suit, charge, or grievance, and that he/she has not requested an investigation, be it judicial, administrative, or otherwise, with any forum, whether judicial, administrative, or otherwise, in relation to the debt for salary adjustment, against the Released Parties. However, if YOU have filed any claim, complaint, suit, charge, or grievance, or if you have requested or initiated an investigation, whether judicial, administrative, or otherwise, in relation to the debt for salary adjustment, YOU shall dismiss, and hereby dismiss, voluntarily and with prejudice, said claim or claims, and request the closing and shelving with prejudice of any said claim or claims, complaint, suit, charge, grievance, or investigation against the Puerto Rico Police Department, that you may have requested, initiated, or joined.

(Employee's signature)

(Date)

[I hereby certify that I am fluent in both Spanish and English and that this is a true and accurate translation to the best of my abilities.]


Margot A. Acevedo Chabert
FCICE Certificate No. 06-001]